

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.:** 16-23974  
**Judge:** Beth E. Hanan  
**Chapter:** Chapter 13

**In Re: Lamar Terrell Hall**

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**NOTICE OF MOTION TO ABANDON PROPERTY OF THE ESTATE**

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To all creditors and parties in interest:

The Debtor, through Geraci Law, LLC, has filed a Motion to Abandon Property of the Estate. A copy of that motion accompanies this notice.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to grant Debtor(s)' motion, or if you want the court to consider your views on the motion, **then on or before 14 days from the date of this Notice**, you or your attorney must file an object with:

1. Clerk, U.S. Bankruptcy Court  
517 East Wisconsin Avenue  
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Law Offices of Peter Francis Geraci  
Andrew Mark Golanowski  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Lamar Terrell Hall  
3841 N. 58th Blvd.  
Milwaukee, WI 53216

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Dated: Friday, May 27, 2016

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Law Offices of Peter Francis Geraci  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (312) 332-1800  
Fax: (877) 247-1960  
Email: [wag@geracilaw.com](mailto:wag@geracilaw.com)

Rec. No: 707284  
WD - MOT - Motion to Incur Additional Debt

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**MOTION TO ABANDON PROPERTY OF THE ESTATE**

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NOW COMES the Debtor, Mr. Lamar Hall (the "Debtor"), by and through his attorneys, Geraci Law, LLC, to present his Motion to Abandon Property of the Estate, and states as follows:

1. Debtor is co-owner of real estate at 5086 Radcliffe Drive, Milwaukee, Wisconsin 53223.
2. Debtor has an offer to purchase that property at a short sale, with consent of the lender, Seaway Bank and Trust Company ("Seaway") for \$158,000.
3. Debtor owes \$167,811 to Seaway, which has a mortgage on the property.
4. The total value of the property is \$188,000, according to the property tax bill. Debtor has a one-half interest in the property.
5. This is the best offer the Debtor has received on the property, which has been on the market for at least 6 months.
6. Debtor needs the Estate to abandon the property in order to proceed with the sale.

WHEREFORE, the Debtor, Mr. Lamar Hall, pray this Court enter an order:

- 1) Approving this Motion to Abandon Property of the Estate.

2) Any other relief that this court deems just and proper.

Respectfully submitted and dated this Friday, May 27, 2016.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney for Debtor  
Bar #: 1055499

Rec. No: 707284  
WD - MOT - Motion to Incur Additional Debt

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.: 16-23974  
Judge: Beth E. Hanan  
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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Motion were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Friday, May 27, 2016:

Lamar Hall  
3841 N. 58th Blvd. 1  
Milwaukee, WI 53216

**SEE ATTACHED LIST**

Additionally, the documents referenced above were also served via electronic means on the following individuals on Friday, May 06, 2016:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Friday, May 27, 2016.

By: /s/ Andrew Mark Golanowski  
Andrew Mark Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew Mark Golanowski  
Law Offices of Peter Francis Geraci  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (312) 332-1800  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Rec. No: 707284  
WD - MOT - Motion to Incur Additional Debt

Label Matrix for local noticing  
0757-2  
Case 16-23974-beh  
Eastern District of Wisconsin  
Milwaukee  
Fri May 27 15:02:43 CDT 2016

BMO Harris  
Bankruptcy Dept.  
3536 W Fond du Lac Ave  
Milwaukee, WI 53216-3737

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta, GA 30374-0241

Heller Law Offices LLC  
1633 N. Prospect Ave, Ste 4C  
Milwaukee, WI 53202-2477

Milwaukee County Child Support  
Attn: Attorney John Pintar  
901 N. 9th Street, Room 101  
Milwaukee, WI 53233-1425

Monique Junior  
1015 N Carrier Pkwy, C257  
Grand Prairie, TX 75050-0817

Roundy S Supermarkets INC.  
C/O THE Affiliated Group I  
Po Box 7739  
Rochester, MN 55903-7739

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester, PA 19022-1023

Wisconsin Dept. of Revenue  
Special Procedures Unit  
PO Box 8901  
Madison, WI 53708-8901

Lamar Terrell Hall  
3841 N. 58th Blvd.  
APT# 1  
Milwaukee, WI 53216-2228

Alliance Collection AG  
Attn: Bankruptcy Dept.  
3916 S Business Park Ave  
Marshfield, WI 54449-9029

Children's Hospital of Wisconsin  
Bankruptcy Dept.  
9000 W. Wisconsin Ave.  
Milwaukee, WI 53226-4874

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen, TX 75013-2002

IRS Priority Debt  
Bankruptcy Dept.  
PO Box 7346  
Philadelphia, PA 19101-7346

Milwaukee County Child support  
Bankruptcy Dept.  
901 N. 9th Street, Room 101  
Milwaukee, WI 53233-1425

Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

Seaway BANK & Trust CO  
Attn: Bankruptcy Dept.  
645 E 87th St  
Chicago, IL 60619-6183

WI SCTF  
Bankruptcy Department  
PO Box 07914  
Milwaukee, WI 53207-0914

Alexander E. George  
Geraci Law L.L.C.  
55 E. Monroe #3400  
Chicago, IL 60603-5920

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203-0161

(p)AMERICOLLECT INC  
PO BOX 2080  
MANITOWOC WI 54221-2080

(p)EDUCATORS CREDIT UNION  
1326 WILLOW RD  
MOUNT PLEASANT WI 53177-1917

Froedtert Hospital  
Bankruptcy Dept.  
PO Box 9030  
Menomonee Falls, WI 53052-9030

Medical College of Wisconsin  
Bankruptcy Dept.  
PO Box 13308  
Milwaukee, WI 53213-0308

Milwaukee County Circuit Court  
2016SC009199  
901 N. 9th St.  
Milwaukee, WI 53233-1425

Optimum Outcomes INC  
Attn: Bankruptcy Dept.  
2651 Warrenville Rd Ste  
Downers Grove, IL 60515-5544

The Law Office of Hazel J Washington SC  
2828 N 60th St.  
Milwaukee, WI 53210-2103

WI SCTF  
Milwaukee County Child Support Services  
901 N 9th St., Rm. 101  
Milwaukee, WI 53233-1425

Andrew M. Golanowski  
Geraci Law, L.L.C.  
55 E. Monroe St. Suite #3400  
Chicago, IL 60603-5920